

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: John Earl Lacy, Debtor**

**Case No. 22-50643-KMS  
CHAPTER 13**

**NOTICE**

The above referenced debtor has filed papers with the court to allow payment arrearage. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to amortize the payments, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk  
U.S. Bankruptcy Court  
Dan M. Russell, Jr. United States Courthouse  
2012 15th St., Ste. 244  
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Allow Payment Arrearage.

Date: July 29, 2025

Signature: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer Ann Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
P.O Box 13767  
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: John Earl Lacy, Debtor**

**Case No. 22-50643-KMS  
CHAPTER 13**

**MOTION TO ALLOW PAYMENT ARREARAGE**

COMES NOW, Debtor, by and through counsel, and moves this Court to amortize their past due Chapter 13 plan payments, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor fell behind on the plan payments.
3. Debtor is requesting this Honorable Court to amortize the past due plan payments over the life of the plan, including any ongoing mortgage payments being paid through the plan.
4. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in August 2025.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MS Bar No. 103469)  
Jennifer Ann Curry Calvillo (MS Bar No. 104367)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Allow Payment Arrearage was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:  
JOHN EARL LACY

CASE NO: 22-50643-KMS

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 13

On 7/29/2025, I did cause a copy of the following documents, described below,  
Notice and Motion to Allow Payment Arrearage

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/29/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. 103469  
Attorney at Law  
The Rollins Law Firm  
702 W. Pine Street  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:  
JOHN EARL LACY

CASE NO: 22-50643-KMS

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13

On 7/29/2025, a copy of the following documents, described below,  
Notice and Motion to Allow Payment Arrearage

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/29/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 W. Pine Street  
Hattiesburg, MS 39401

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

## CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
NCRS ADDRESS DOWNLOAD  
CASE 22-50643-KMS  
SOUTHERN DISTRICT OF MISSISSIPPI  
TUE JUL 29 8-32-41 PST 2025

ALLY BANK CO AIS PORTFOLIO SERVICES  
LP  
4515 N SANTA FE AVE DEPT APS  
OKLAHOMA CITY OK 73118-7901

LVNV FUNDING LLC  
PO BOX 10587  
GREENVILLE SC 29603-0587

LVNV FUNDING LLC  
CO RESURGENT CAPITAL SERVICES  
PO BOX 10587  
GREENVILLE SC 29603-0587

(P)NATIONSTAR MORTGAGE LLC  
PO BOX 619096  
DALLAS TX 75261-9096

NATIONSTAR MORTGAGE LLC DBA MR COOPER  
PO BOX 619096  
DALLAS TX 75261-9096

~~EXCLUDE~~

~~US BANKRUPTCY COURT  
DAN M RUSSELL JR US COURTHOUSE  
2012 15TH STREET SUITE 244  
GULFPORT MS 39501-2036~~

ADRIENE WALLACE  
66 COUNTY RD 170  
QUITMAN MS 39355

ADVANCED COLLECT  
1825 24TH AVE  
MERIDIAN MS 39301-3116

ALLY BANK CO AIS PORTFOLIO SERVICES  
LLC  
4515 N SANTA FE AVE DEPT APS  
OKLAHOMA CITY OK 73118-7901

ALLY FINANCIAL  
PO BOX 380901  
MINNEAPOLIS MN 55438-0901

AMEX  
PO BOX 981537  
EL PASO TX 79998-1537

BABERS LEASING  
423 AZALEA DR  
WAYNESBORO MS 39367-2624

CAPITAL ONE  
PO BOX 31293  
SALT LAKE CITY UT 84131-0293

CAPITAL ONE BANK (USA) NA  
BY AMERICAN INFOSOURCE AS AGENT  
4515 N SANTA FE AVE  
OKLAHOMA CITY OK 73118-7901

DELPHIA J BARNES  
21 WILLIE LINDSEY DR  
COLLINS MS 39428-7346

ELIZABETH CROWELL PRICE ESQ  
FOR NATIONSTAR MORTGAGE LLC  
1820 AVENUE OF AMERICA  
MONROE LA 71201-4530

JALIN LACEY  
551 BIG ROCK RD  
WAYNESBORO MS 39367-9688

KIMBERLY D PUTNAM ESQ  
DEAN MORRIS LLC  
FOR NATIONSTAR MORTGAGE LLC  
1820 AVENUE OF AMERICA  
MONROE LA 71201-4530

LOGS LEGAL GROUP LLP  
BEHALF OF NATIONSTAR MORTGAGE LLC  
DBA MR COOPER  
1080 RIVER OAKS DRIVE SUITE B-202  
FLOWOOD MS 39232-7603

~~EXCLUDE~~

~~(D) LVNV FUNDING LLC  
PO BOX 10587  
GREENVILLE SC 29603-0587~~

~~EXCLUDE~~

~~(D) LVNV FUNDING LLC  
CO RESURGENT CAPITAL SERVICES  
PO BOX 10587  
GREENVILLE SC 29603-0587~~

MS DEPT OF REVENUE  
BANKRUPTCY SECTION  
PO BOX 22808  
JACKSON MS 39225-2808

MSDHS  
ATTN CONSTANCE MORROW  
PO BOX 352  
JACKSON MS 39205-0352

MONEYKEY  
3422 OLD CAPITOL TRAIL  
STE 1613  
WILMINGTON DE 19808-6124

MR COOPER  
8950 CYPRESS WATERS BL  
COPPELL TX 75019-4620

~~EXCLUDE~~

~~(D) (P) NATIONSTAR MORTGAGE LLC  
PO BOX 619096  
DALLAS TX 75261-9096~~

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

NAVIENT  
PO BOX 3229  
WILMINGTON DE 19804-0229

NETWORK SERVICES INC  
PO BOX 1725  
HATTIESBURG MS 39403-1725

PERCY HARRIS  
PO BOX 433  
SHUBUTA MS 39360-0433

PERSONIFY  
PO BOX 500650  
SAN DIEGO CA 92150-0650

PINK DOGWOOD 13 LLC  
PO BOX 1931  
BURLINGAME CA 94011-1931

PROSPER FUNDING LLC  
221 MAIN STREET  
SAN FRANCISCO CA 94105-1906

PROSPER MARKETPLACE INC  
CO WEINSTEIN RILEY PS  
2001 WESTERN AVE STE 400  
SEATTLE WA 98121-3132

(P)REPUBLIC FINANCE LLC  
282 TOWER RD  
PONCHATOULA LA 70454-8318

~~EXCLUDE~~

~~(D) (P) REPUBLIC FINANCE LLC  
282 TOWER RD  
PONCHATOULA LA 70454-8318~~

SCOLOPAX LLC  
CO WEINSTEIN RILEY PS  
2001 WESTERN AVE STE 400  
SEATTLE WA 98121-3132

SEARS  
701 E 60TH STREET N  
SIOUX FALLS SD 57104-0432

SYNCBJCI HOME DESIGN  
PO BOX 965036  
ORLANDO FL 32896-5036

SYNCBBELK DUAL CARD  
PO BOX 965029  
ORLANDO FL 32896-5029

SYNCHRONY BANK  
PO BOX 965007  
ORLANDO FL 32896-5007

~~EXCLUDE~~

~~UNITED STATES TRUSTEE  
501 EAST COURT STREET  
SUITE 6 430  
JACKSON MS 39201-5022~~

(P)UPGRADE INC  
2 N CENTRAL AVE  
10TH FLOOR  
PHOENIX AZ 85004-4422

UPSTART FINANCE  
2 CIRCLE STAR WAY  
SAN CARLOS CA 94070-6200

UPSTART NETWORK  
PO BOX 1931  
BURLINGAME CA 94011-1931

VISA  
PO BOX 31279  
TAMPA FL 33631-3279

WELLS FARGO BANK NA  
PO BOX 14517  
DES MOINES IA 50306-3517

WORLD ACCEPTANCE CORP  
PO BOX 6429  
GREENVILLE SC 29606-6429

WORLD FINANCE  
WORLD ACCEPTANCE CORPORATION  
ATTN BANKRUPTCY  
PO BOX 6429  
GREENVILLE SC 29606-6429

~~EXCLUDE~~

~~(P) DAVID RAWLINGS  
ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE  
PO BOX 566  
HATTIESBURG MS 39403-0566~~

JENNIFER A CURRY CALVILLO  
THE ROLLINS LAW FIRM  
702 W PINE ST  
HATTIESBURG MS 39401-3836

DEBTOR  
JOHN EARL LACY  
6179 HWY 45 N  
WAYNESBORO MS 39367-9073

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR  
THE ROLLINS LAW FIRM PLLC  
PO BOX 13767  
JACKSON MS 39236-3767~~